

Shaun Setareh, SBN 204514
shaun@setarehlaw.com
Thomas Segal, SBN 222791
thomas@setarehlaw.com
Farrah Grant, SBN 293898
farrah@setarehlaw.com
SETAREH LAW GROUP
9665 Wilshire Blvd., Suite 430
Beverly Hills, California 90212
Telephone (310) 888-7771
Facsimile (310) 888-0109

Attorneys for Plaintiffs

Michael S. Chamberlin, SBN 175427
mchamberlin@bakerlaw.com
Nicholas D. Poper, SBN 293900
npoper@bakerlaw.com
BAKER & HOSTETLER LLP
11601 Wilshire Boulevard, Suite 1400
Los Angeles, CA 90025-0509
Telephone: (310) 820-8800
Facsimile: (310) 820-8859

Attorneys for Defendant
PHILLIPS 66 COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEAN A. ROBBINS and TIMOTHY
GREEN, on behalf of themselves, all others
similarly situated,

Plaintiffs,

vs.

PHILLIPS 66 COMPANY, a Delaware
corporation; and DOES 1 through 50,
inclusive,

Defendant.

Case No. 3:18-cv-00292-RS
(consolidated Case No. 19-cv-01558-RS)

STIPULATION AND ~~PROPOSED~~
ORDER REGARDING DISCOVERY

Action Removed: January 12, 2018
Action Filed: November 27, 2017

1 Plaintiffs Dean Robbins, Timothy Green, Ian Clare, and Keith Washington (“Plaintiffs”)
2 and Phillips 66 Company (“Defendant”) (collectively, the “Parties”), through their respective
3 counsel of record, stipulate and agree as follows:

4 WHEREAS, on or about June 5, 2023, Plaintiffs requested that Defendant produce
5 timekeeping and payroll data of Phillips 66’s non-exempt employees in California for the time
6 period of March 30, 2021 to the present;

7 WHEREAS, Defendant has agreed to produce timekeeping and payroll data of Defendant’s
8 non-exempt employees in California for the time period of March 30, 2021 to the present, as
9 relevant to Plaintiffs’ cause of action under the California Private Attorneys General Act (“PAGA”)
10 only and for no other purpose;

11 WHEREAS, nothing in this stipulation is intended or should be construed as an admission
12 by either party as to the relevance of the timekeeping and payroll data being produced, and this
13 stipulation has no bearing on any dispute regarding the relevance of the data being produced with
14 respect to Plaintiffs’ class and PAGA claims;

15 WHEREAS, Defendant has agreed to produce the aforementioned timekeeping and payroll
16 data by August 31, 2023;

17 WHEREAS, Plaintiffs have requested that the Parties file a stipulation with respect to the
18 Parties’ agreement; and

19 Accordingly, the Parties stipulate, subject to the Court’s approval, as follows:

20 On or before August 31, 2023, Phillips 66 will produce timekeeping and payroll data of
21 Phillips 66’s non-exempt employees in California for the time period of March 30, 2021 to the
22 present.

23 IT IS SO STIPULATED.

24 Dated: August 11, 2023

SETAREH LAW GROUP

By: /s/ Thomas Segal

Shaun Setareh

Thomas Segal

Farrah Grant

Attorneys for Plaintiffs

1 Dated: August 11, 2023

BAKER & HOSTETLER LLP

2 By: /s/ Nicholas D. Poper
3 Michael S. Chamberlin
4 Nicholas D. Poper

5 *Attorneys for Defendant*
6 PHILLIPS 66 COMPANY

7 **ATTESTATION**

8 I, Thomas Segal, attest that all other signatures listed, and on whose behalf the filing is
9 submitted, concur in the filing's contents and have authorized the filing.

10 /s/ Thomas Segal

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
BAKER & HOSTETLER LLP
ATTORNEYS AT LAW
LOS ANGELES

~~PROPOSED~~ ORDER

Pursuant to the Parties' stipulation, IT IS SO ORDERED.

DATED: August 11, 2023


HONORABLE THOMAS S. HIXSON
United States Magistrate Judge

BAKER & HOSTETLER LLP
ATTORNEYS AT LAW
LOS ANGELES